

EXHIBIT 1

**EMAILS WITH COUNSEL FOR DONAIS DEFENDANTS AND COUNSEL FOR
HILLIARD DEFENDANTS SHOWING DENIAL OF REPRESENTATION OF JOHN
DOE COMPANIES**

**EMAILS WITH COUNSEL FOR DONAIS DEFENDANTS
[SHOWING THEY DENY REPRESENTATION OF INSURANCE COMPANIES]**

Re: Insurance Carrier Questions and Preservation Hold

From: Andre Bisasor (quickquantum@aol.com)

To: elanders@morrisonmahoney.com

Cc: lsmith@morrisonmahoney.com; dsonneborn@preti.com

Date: Monday, March 25, 2024 at 01:53 PM EDT

You have not answered my specific questions below.

-Andre

On Tuesday, March 19, 2024 at 04:03:40 PM EDT, Andre Bisasor <quickquantum@aol.com> wrote:

Ed

I dont believe you actually answered my question: Can I direct to you, or can you receive, letters or legal documents from me, on behalf of the insurance carrier(s)?

In other words, can you pass along letters or legal documents from me to the insurance carriers and ensure they get it?

Andre Bisasor

On Tuesday, March 19, 2024 at 03:58:20 PM EDT, Landers, Edwin <elanders@morrisonmahoney.com> wrote:

Dear Mr. Bisasor,

We are representing only the Donais defendants in this action.

Regards,

Ed

Edwin F. Landers, Jr.
Partner

MORRISON MAHONEY LLP
250 Summer Street, Boston, MA 02210
T (617) 439-7583 | F (617) 342-4967
ELanders@morrisonmahoney.com | www.morrisonmahoney.com

Connecticut | Massachusetts | New Hampshire | New Jersey | New York | Rhode Island | United Kingdom

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From: Andre Bisasor <quickquantum@aol.com>

Sent: Tuesday, March 19, 2024 3:55 PM

To: Landers, Edwin <ELanders@morrisonmahoney.com>

Cc: Smith, Linda <LSmith@morrisonmahoney.com>; Sonneborn, Daniel R. <dsonneborn@preti.com>

Subject: Re: Insurance Carrier Questions and Preservation Hold

External Email from Andre Bisasor <quickquantum@aol.com>. Do not click on links, open attachments, or reply before confirming this is a valid email.

Ed,

To be clear, it sounds like you are again refusing to answer the below questions.

However, I did not ask one of the questions previously and so can you at least answer that question as follows: **Can I direct to you, or can you receive, letters or legal documents from me, on behalf of the insurance carrier(s)?**

Andre Bisasor

On Tuesday, March 19, 2024 at 03:46:48 PM EDT, Landers, Edwin <elanders@morrisonmahoney.com> wrote:

Dear Mr. Bisasor,

The Donais defendants' position remains unchanged from that conveyed to you in the attached email exchange of July 19, 2023.

Regards,

Ed

Edwin F. Landers, Jr.

Partner

MORRISON MAHONEY LLP

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From: Andre Bisasor <quickquantum@aol.com>

Sent: Friday, March 15, 2024 12:15 PM

To: Landers, Edwin <ELanders@morrisonmahoney.com>

Subject: Insurance Carrier Questions and Preservation Hold

External Email from Andre Bisasor <quickquantum@aol.com>. Do not click on links, open attachments, or reply before confirming this is a valid email.

Dear Ed,

I have a couple questions pertaining to this matter as follows:

1. What is the name of the insurance carrier(s) for the Donais defendants?
2. Also, what is the location and address of the insurance carrier(s)?
3. Are you insurance counsel for this insurance carrier(s)
4. Can I direct to you, or can you receive, letters or legal documents from me, on behalf of the insurance carrier(s)?
5. What is the policy limit for the policy applicable to this matter that covers the Donais defendants?

Can you please answer these questions or any of them? I may have asked some of these to you before but I am asking again here in one place.

NB: Please remember to preserve all documents, emails, correspondence and materials that are relevant to this matter including matters applicable to potential discovery, deposition and for trial. This is a reminder of a preservation/litigation hold that applies to all defendants as well as to the insurance carrier(s).

I look forward to your reply.

Sincerely,

Andre Bisasor

Mr. Bisasor,

We agree with the position set forth by Dan. We also do not believe that any insurance coverage has any bearing on the motions before the court.

Regards,

Ed

Edwin F. Landers, Jr.

Partner

MORRISON MAHONEY LLP

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From: Andre Bisasor <quickquantum@aol.com>

Sent: Wednesday, July 19, 2023 3:20 PM

To: Landers, Edwin <ELanders@morrisonmahoney.com>; Donovan, Ian <IDonovan@morrisonmahoney.com>;

Saturley, William C. <wsaturley@preti.com>; Sonneborn, Daniel R. <DSonneborn@preti.com>

Subject: Re: Insurance question

External Email from Andre Bisasor <quickquantum@aol.com>. Do not click on links, open attachments, or reply before confirming this is a valid email.

Dan,

If you do not want to give me the name of the insurance company, can you confirm you are insurance counsel?

So are you not denying that you are insurance counsel?

I can infer that the answer to that is yes.

Andre

On Wednesday, July 19, 2023 at 03:16:02 PM EDT, Sonneborn, Daniel R. <dsonneborn@preti.com> wrote:

Mr. Bisasor,

That information will be provided to you at the time dictated by the Federal Rules of Civil Procedure and Local Rules. We see no reason to provide it sooner.

Thank you,

Dan

Daniel R. Sonneborn
Director
PretiFlaherty

From: Andre Bisasor <quickquantum@aol.com>

Sent: Wednesday, July 19, 2023 12:09 PM

To: Sonneborn, Daniel R. <DSonneborn@preti.com>; Edwin Landers <elanders@morrisonmahoney.com>; Ian Donovan <idonovan@morrisonmahoney.com>; Saturley, William C. <WSaturley@preti.com>

Subject: Insurance question

Note: *** This email originated from outside of Preti. Please do not click on any links or open attachments unless you can verify the sender and content.***

Dear Ed, Dan, and All,

Are you of you insurance counsel for the defendants malpractice insurance carrier or any other insurance carrier that pertains to this case?

Also, could you inform me of the name of the insurance carrier(s), regardless of whether you are insurance counsel or not

Thanks

Andre

This E-Mail may contain information that is privileged, confidential and / or exempt from discovery or disclosure under applicable law. Unintended transmission shall not constitute waiver of the attorney-client or any other privilege. If you are not the intended recipient of this communication, and have received it in error, please do not distribute it and notify me immediately by E-mail at dsonneborn@preti.com or via telephone at 617.226.3800 and delete the original message. Unless expressly stated in this e-mail, nothing in this message or any attachment should be construed as a digital or electronic signature or as a legal opinion.

**EMAILS WITH COUNSEL FOR HILLIARD DEFENDANTS
[SHOWING THEY DENY REPRESENTATION OF INSURANCE COMPANIES]**

Re: Insurance Carrier Questions and Preservation Hold

From: Andre Bisasor (quickquantum@aol.com)

To: dsonneborn@preti.com

Date: Tuesday, April 2, 2024 at 03:15 PM EDT

Dan,

What prior responses are those? can you repeat those here, as I am not certain of what "responses" those are. I am only aware of one response long ago.

Also, can you at least answer this: are you able to receive letters or legal documents for or on behalf of or to pass on to the insurance carrier(s)?

Andre

On Tuesday, April 2, 2024 at 03:10:58 PM EDT, Sonneborn, Daniel R. <dsonneborn@preti.com> wrote:

Andre,

My prior responses regarding these issues remains and with respect to anything else, it will be answered if/when appropriate.

Thanks,

Dan

Daniel R. Sonneborn
Director
PretiFlaherty

From: Andre Bisasor <quickquantum@aol.com>
Sent: Monday, March 25, 2024 1:54 PM
To: Sonneborn, Daniel R. <DSonneborn@preti.com>
Subject: Re: Insurance Carrier Questions and Preservation Hold

Note: *** This email originated from outside of Preti. Please do not click on any links or open attachments unless you can verify the sender and content.***

Dan, you have not answered my email below-

Andre

On Friday, March 15, 2024 at 12:28:34 PM EDT, Andre Bisasor <quickquantum@aol.com> wrote:

Correction: I meant "Dear Dan"

On Friday, March 15, 2024 at 12:21:03 PM EDT, Andre Bisasor <quickquantum@aol.com> wrote:

Dear Ed,

I have a couple questions pertaining to this matter as follows:

1. What is the name of the insurance carrier(s) for the Hilliard defendants?
2. Also, what is the location and address of the insurance carrier(s)?
3. Are you insurance counsel for this insurance carrier(s)?
4. Can I direct to you, or can you receive, letters or legal documents from me, on behalf of the insurance carrier(s)?
5. What is the policy limit for the policy applicable to this matter that covers the Hilliard defendants?

Can you please answer these questions or any of them? I may have asked some of these to you before but I am asking again here in one place.

NB: Please remember to preserve all documents, emails, correspondence and materials that are relevant to this matter including matters applicable to potential discovery, deposition and for trial. This is a reminder of a preservation/litigation hold that applies to all defendants as well as to the insurance carrier(s).

I look forward to your reply.

Sincerely,

Andre Bisasor

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